REMARKS

Claims 1-16 and 18-33 are pending. Claims 1, 5-8, 10, 14, 16, 23-26, and 28 have been amended, claim 17 has been canceled, and new claims 29-33 have been added to recite additional features of the embodiments disclosed in the specification. The claim amendments including amending claim 28 to replace "transforming" with "transferring."

In the Final Office Action, claims 1-16 and 18-28 were rejected under 35 USC § 103(a) based on an AAPA-Loughran combination. This rejection is traversed as follows.

Claim 1 recites at least two features that are neither taught nor suggested by the cited references. Moreover, the Examiner's repeated reliance on features believed to be "inherent" (see page 3 of the Final Office Action) is improper as a matter of law.

First, claim 1 recites "respectively storing, in different locations of a second memory area, the brightness control information read out from the first memory area for the first and second power modes." These features are not taught or suggested by the related-art disclosure in Applicant's specification. The Examiner has acknowledged this deficiency on the record.

The Loughran publication does not make up for these deficiencies. The Loughran publication discloses the general concept of performing different power management based on whether a notebook computer is driven by a battery or main supply current. (See Paragraph [0008]). The Examiner has relied on this paragraph of Loughran, as well as Paragraphs [0062] and [0068], to reject claim 1.

Paragraph [0008] discloses providing different power management dependent on a power source used to power a notebook computer. That is all it discloses. Based on this disclosure and the fact that the Loughran notebook has a RAM (e.g., a rewritable memory), the Examiner concluded that the storing step would have been **inherent** to the Loughran disclosure. But this clearly is not the case.

In order to be "inherent" for purposes of issuing a proper rejection, the MPEP § 2131 provides that a claimed feature which is not expressly taught or suggested in a reference must be necessarily present in the reference. When applied to the rejection of claim 1, the storing step of claim 1 must therefore necessarily be present in the Loughran method, i.e., there can be no other possible ways of performing power management other than the way recited in claim 1. However, this clearly is not the case.

Paragraph [0008] discloses performing different power management depending on the power source used to power the notebook computer. The Loughran publication further discloses a variety of ways of accomplishing this function, however none of them correspond to the storing step recited in claim 1. For example, at Paragraph [0060], the Loughran publication discloses performing power management by suppressing certain features of the computer in a lower power mode or by controlling CPU time. Both of these techniques are different from the recitation in claim 1 of "respectively storing, in different locations of a second memory area, the brightness control information read out from the first memory area for the first and second power modes."

The disclosure at Paragraph [0060], therefore, clearly indicates that the storing step is not necessarily present in the method disclosed in the Loughran publication. Accordingly, the storing step cannot properly be said to be **inherent** in this reference.

Paragraph [0062] discloses allowing a user to modify power management behavior for different power modes. However, the Loughran publication does not teach or suggest that this modification is necessarily performed by the storing step of claim 1. Rather, it involves the suppression of certain features or a change in CPU time. Accordingly, the storing step of claim 1 also cannot properly be said to be **inherent** in the Loughran publication based on the disclosure in Paragraph [0062].

Paragraph [0068] discloses an example of how the Loughran method suppresses or modifies a certain feature of its computer to perform power management, in this case dimming the backlight of the computer display. While dimming relates to brightness, Loughran does not expressly disclose "respectively storing, in different locations of a second memory area, the brightness control information read out from the first memory area for the first and second power modes," nor are these features necessarily required to be performed in Loughran as there are ways of accomplishing this dimming other than that recited in claim 1. Accordingly, the storing step cannot properly be said to be **inherent** in Loughan publication.

For the foregoing reasons, it is therefore clear that the storing step of claim 1 is not necessarily present in any of the three paragraphs of Loughran relied on to reject claim 1. Nor is

this step expressly taught or suggested by Loughran. Accordingly, an AAPA-Loughran combination cannot, as a matter of law, be deemed to render claim 1 obvious.

Regarding the Examiner's contention that the Loughran notebook has a RAM that *can* be used to perform the storing step of claim 1, Applicants emphasize that while RAM 11 is *capable* of storing virtually any type of information, to satisfy the requirements of § 103(a) a cited reference much provide a specific teaching or suggestion of performing the storing step. See MPEP § 2143.01 et seq. The Loughran publication does not provide a teaching or suggestion of this step, either expressly or inherently.

Second, claim 1 recites "controlling the brightness level of the display based on the brightness control information independently stored in the different locations of the second memory area for the confirmed power mode." The Loughran publication does not teach or suggest these features, nor are they inherent based on the disclosures in Paragraphs [0008], [0062], and [0068] of Loughran. Rather, Loughran discloses performing different power management techniques that involve suppressing certain features, modifying them, or controlling CPU time. However, all of these may be accomplished without the information stored in the different locations of the second memory area recited in claim 1. Therefore, the controlling step of claim 1 also cannot be properly said to be inherent to the Loughran publication.

Applicants further note that, in paragraph 34 of page 9, AAPA does not disclose the controlling step. Rather, this paragraph merely discloses adapting brightness control information related to a power mode previously used, irrespective of each power mode.

Based on the foregoing differences, it is respectfully submitted that claim 1 and its dependent claims are allowable.

Claim 10 recites features similar to those which patentably distinguish claim 1 from the cited references. For example, claim 10 recites respectively storing, in different locations of a second storage area, brightness level information read out from the first storage area for a first power supply and brightness level information read out from the first storage area for a second power supply. These features are not taught or suggested by the cited references. Claim 10 further recites "updating the second storage area to independently store the index information in the different locations of the second storage area according to the determined type of power supply." These features are also not taught or suggested by the cited references.

Claim 16 recites "respectively storing, in different locations of a second storage area, index information read out from the first storage area from one of the brightness levels in a first power mode and index information read out from the first storage area from one of the brightness levels in the second power mode." These features are not taught or suggested by the cited references. Claim 20 recites similar features and is allowable for similar reasons.

Claims 23-26 recite the additional feature of simultaneously storing the brightness control information in the first and second power modes. These features are also not taught or suggested by the cited references.

Claims 27 and 28 recite features that are not taught or suggested by the related-art systems and the Loughran publication, whether taken alone or in combination.

Claims 23-26 were rejected under 35 USC § 112, first paragraph, on grounds that the specification fails to provide a written description of the subject matter recited therein. To overcome this rejection, claim 23 was amended to recite that the "the brightness control information for the first and second power modes are stored simultaneously in the different locations of the second memory area." This change is consistent with the Examiner's indication of the written subject matter in the specification, as set forth on page 2 of the Final Office Action. Claims 24-26 were amended in a similar manner. Withdrawal of the § 112 rejection is therefore respectfully requested.

New claims 29-33 have been added to the application.

Claim 29 recites that the brightness control information for the first and second power modes is stored simultaneously into locations of a microcomputer random access memory (micom RAM) and a system initialization RAM. These features are not taught or suggested by the cited references. Claims 30-32 recite similar features.

Claim 33 recites detecting a change in a power mode currently being used, and reading out brightness control information corresponding to the changed power mode from the second memory, wherein the brightness control information corresponding to the changed power mode is independently stored in different locations of the second memory, which includes at least one of a microcomputer random access memory (micom RAM) or a system initialization RAM. These features are not taught or suggested by the cited references.

In view of the foregoing amendments and remarks, it is respectfully submitted that this application is in condition for allowance. Favorable consideration and timely allowance of the application is respectfully requested.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

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